

North American Numbering Council
Meeting Minutes
January 20, 1998

I. Time, Date and Place of Meeting: The North American Numbering Council held a meeting, commencing at 8:30 a.m., at the ANA Hotel, 2401 M Street, NW, Room 856, Washington, DC.

II. List of Attendees:

Council Members

<u>Voting Members</u>	<u>Organization</u>
1. Heather Gold/Emily Williams	ALTS
2. Colette Capretz	American Mobile Satellite
3. Woody Kerkeslager	AT&T
4. Dan Hochvert	Bell Atlantic
5. Roger Werth	Cincinnati Bell
6. Ronald Binz	Competition Policy Institute
7. Brian Fontes/Lori Messing	CTIA
8. Alan Hasselwander	Frontier
9. Bernard Harris	GTE
10. Peter Guggina	MCI
11. Gerry Thompson	Mobility Canada
12. Vincent Majkowski	NARUC
13. Jo Anne Sanford	NARUC
14. Beth O'Donnell	NCTA
15. Christine Walker	Nextlink Communications
16. Lawrence Krevor	Nextel Communications
17. Ray Strassburger	Northern Telecom (Nortel)
18. Anna Miller	Omnipoint
19. Trenton Boaldin	OPASTCO
20. Mark Golden	PCIA
21. Mike Bennett	SBC Communications
22. Norina Moy	Sprint Corporation
23. Diane Little	Sprint Spectrum PCS
24. Jacques Sarrazin	Stentor Resource Center
25. Ed Gould	Teleport (TCG)
26. Dan Bart	TIA
27. Paul Hart	USTA

Special Members (non-voting):

Susan Miller	ATIS
Glenn Pilley	Industry Canada

B. Commission Employees

Marian Gordon, Designated Federal Official

Geraldine Matise, Chief, Network Services Division (NSD), CCB

Erin Duffy, NSD, CCB

Les Selzer, NSD, CCB

Kris Monteith, NSD, CCB

Elizabeth Nightingale, NSD, CCB

Patrick Forster, NSD, CCB

Jeannie Grimes, NSD, CCB

Jared Carlson, NSD, CCB

III. Estimated Public Attendance: Approximately 65 members of the public attended the meeting as observers.

IV. Documents Introduced. Each member received the following handouts:

- (1) Agenda
- (2) Industry Numbering Committee (INC) Report on Number Pooling
- (3) Number Pooling Management Group (NPMG) Report
- (4) NANPA Working Group Report
- (5) Aging & Administration of Disconnected Telephone Numbers
- (6) Recommended Audit Framework - Draft
- (7) CO Code Administration Transition Update
- (8) Lockheed Martin-IMS NANPA Status Report
- (9) Central Office Code (NXX) Assignment Guidelines, April 1997
- (10) NPA Code Relief Planning and Notification Guidelines, April 1997
- (11) DSMI Review of SMS/800 Services, Charron Cox
- (12) Cost Recovery Working Group Report
- (13) LNPA Working Group Status Report
- (14) Wireline/Wireless Integration Task Force Report
- (15) Support for FCC-Defined Service Provider Portability in an Environment of Inconsistent Rate Centers, Presentation by Carl J. Hansen, Omnipoint
- (16) MCI Position on WWITF Position Papers

V. Summary of the Meeting:

A. Welcoming Remarks. Alan Hasselwander, Chairman of the Council, provided welcoming remarks.

B. Number Pooling Management Group Report. Cathy Handley, Assistant INC Moderator,

provided the report to the Council. The NPMG will continue to coordinate the pooling efforts between the LNPA Working Group, the NANPA Working Group, and INC. NPMG will continue providing monthly status reports to the NANC. The NPMG will provide suggested milestones and completion dates for items listed below at the February 18, 1998, NANC meeting.

The NPMG recommended that the responsibilities for developing a recommendation to the Commission on number pooling be divided as follows (*See Handout pages 5,6 & 7*):

INC: (1) 1000 block pooling guidelines; (2) selection/identification of TN level pooling methodology; (3) TN level pooling guidelines; and (4) modifications to existing INC guidelines as needed to accommodate both 1000 block and TN level pooling.

LNPA Working Group: (1) development of NPAC number pooling operation flows; and (2) development of NPAC requirements for number pooling following completion of the operation flows.

NANPA Working Group: (1) development of the requirements for the Pooling Administrator(s); (2) recommendation of a process for selection of the Pooling Administrator(s); and (3) development of a recommendation for the selection of the Pooling Administrator(s)

The NPMG identified the following items as being beyond the mission and scope of the NPMG member committees: (1) switch requirements; (2) SCP requirements; (3) STP/SS7 requirements; (4) TRA product requirements (LERG); (5) evaluation of emergency services impacts; (6) evaluation/assessment of OSS impacts; and (7) overall industry assessment of technical feasibility of target architecture and determination of the time frame for vendor development and deployment. The NPMG requested that the NANC notify each of the Working Groups and the INC of its concurrence in the proposed division of the identified responsibilities, and request each group to begin the work necessary to complete the identified items.

Dan Hochvert, Bell Atlantic, questioned whether these issues and work items are beyond the scope of the NANC. Chairman Hasselwander stated that the NANC has responsibility for developing a recommendation to the Commission on number pooling, and that in doing so the NANC should identify items beyond the NANC's scope and recommend where these items need to be worked. The NANC may not work the issues, but it needs to ensure that all the necessary work is coordinated if pooling is to become a reality. Bernie Harris, GTE, stated that pooling needs to be defined on a national basis and that NANC needs to ensure that there are not multiple state level or other jurisdictional level implementations of pooling that will create confusion in the overall numbering scheme. Bernie stated that NANC has to manage the development of pooling and coordinate the activities upon which the deployment of pooling will depend. Ron Binz, CPI, concurred, noting that it is incumbent on the NANC to determine what those activities are for the issues listed, particularly the assessment of the OSS impacts of number pooling. Vincent Majkowski, NARUC, stated that the industry is going to have to work out the technical implications for each one of these areas, and that they all impact where the NANC wants to move with number pooling.

Chairman Hasselwander asked the Council whether it agreed with the NPMG's proposed divisions of the various tasks. Peter Guggina, MCI, recommended that NANC accept the recommendation of the NPMG and move to the issue scope that they have outlined. Mike Bennett, SBC, concurred. The Council adopted the report as given and Chairman Hasselwander stated that letters would be sent to each of the working groups noted in the report.

C. *Industry Numbering Committee (INC) Report on Number Pooling.* Jo Gallagher, INC Moderator, presented the status report on Issue 105, Number Pooling. She discussed the results of the January 13 - 14th, 1998 meeting, reviewed the time estimate to complete 1000 block pooling guidelines, discussed possible prioritization of remaining work, and reviewed the INC LNPA Workshop's future meeting schedule. Several contributions were received and are listed in the handout.

Jo stated that the key agreements reached on pooling at the last INC meeting were: (1) text changes to INC Report on Number Pooling (version 3) will be reflected by the use of revision marks for any additions, deletions or revisions; (2) the target date for completion of the 1000 block number pooling assignment guidelines, including developing a precise definition of "contamination," is the July 1998 NANC meeting; and (3) INC will determine at its March Workshop when it will complete the remaining work associated with pooling inside the rate center. Additionally, INC participants agreed on the following list of items that need to be finished in order complete the work associated with pooling inside the rate center: (1) review outstanding contributions; (2) pooling assignment guidelines for 1000 block pooling; (3) alternatives for TN pooling; (4) pooling assignment guidelines for TN pooling; (5) any necessary modifications to existing guidelines; and (5) finalization of the INC Initial Report to the NANC on Number Pooling.

Bernie Harris expressed concern that 50 states are working on some version of number pooling, and appear to have fixed the definition of "contamination" at 10%, but it is not clear to him what the 10% is based on. He stated that the states need to know that national guidelines are under development. Chairman Hasselwander commented that states are moving forward at their own risk in that regard, and that, ultimately, there will be national standards for number pooling that they will need to adopt.

Peter Guggina, MCI, stated that 1000s block number pooling work should move quickly, and asked whether the July 19, 1998 target date could be advanced to April. He stated that states have an expectation that work is quickly ongoing at a national level. He stated that much of the work that will be used for a national report is occurring or already has occurred in Illinois and New York, and that all new material will not have to be developed for this activity. Jo said that she could not speak to acceleration of the current timeline without conferring with the INC. Jo stated that, in her personal opinion, April would not be realistic for several reasons. First, she stated that the INC only had five days scheduled before April 2, which would not be adequate time to do a quality job on industry guidelines for 1000s block pooling. Second, she stated that the issue of where number pooling administration functions are going to be performed and whether they will be performed by the current NANPA or another administrator will require input from the LNPA Working Group T&O Task

Force. If there are two separate administrators, process flows will be affected and the guidelines work will also be affected. Jo stated that there may be threshold issues that the NANC is going to have to work through that will impact the ability to finalize guidelines and process flows because the two are intimately joined together. Jo noted that it is clear that there are interfaces between the NPAC and the NANPA, which will require close coordination and communication. For those reasons alone, she said, April would not allow time for a quality job to be done not just by INC but by the other working groups that affect the guidelines work. Ed Gould, TCG, suggested that perhaps by April there could be status report on any open issues that would prevent completion by July 1998. Ed also stated that 90% of what is required is completed by the work that has gone on in New York and Illinois.

Chairman Hasselwander asked the NARUC representatives if they had any guidance on additional things the NANC can do to coordinate with the states. Vincent Majkowski stated that work in Illinois and New York will continue until the Commission issues an order on national standards. He stated that in the meantime deference should be given to the states and how they view these issues. When national standards are adopted, states, if necessary, will seek waivers if they are so out of line with what is eventually published. Vincent stated that, from a NARUC position, he was pleased to see the July 1998 date, but will defer to industry on whether or not they could accelerate the date and take advantage of the efforts of Illinois and New York.

Jo stated that the INC is coordinating with Illinois and New York, and that contributions were presented from Illinois and New York as input to consider. In her view, some of the work out of those states will be applicable, depending on the national target architecture, but it is unlikely that 100% will be useable. Peter Guggina, MCI, stated that it is likely that all of it will be useful, and that there is a trial in April in Illinois. He stated that the same people involved in the state activity are involved in the national activity so it is unlikely that we are going to reinvent the wheel on a national basis. Peter reiterated that the states are being told that pooling activity is happening on a national level at a very fast rate, and that he thinks the proposed dates for a report to NANC should be accelerated.

Chairman Hasselwander noted demands are being placed on a very limited resource, and that the NANC needs to discuss whether there are ways to get greater resources out of its members' companies and organizations. Anna Miller, Omnipoint, stated that INC is contribution driven. She noted that it is unclear whether the New York and Illinois guidelines will be perfect for a national architecture or not, but that, if there are companies who are confident that it is the case, they should bring it to the INC, and the issue could be worked at the next INC meeting.

Bernie Harris asserted that the industry needs time to reflect on the results of the April trial before reaching conclusions on the guidelines and the rest of the issues. Peter Guggina agreed and modified his request from April to May 1998 instead of July 1998. Peter stated that there are sufficient people at INC that do not want pooling to happen quickly, and that he doubts that there will be a positive indication on accelerating the date. He stated that NANC needs to establish an objective so that the resources can be applied to meet the ultimate goal, rather than letting the project establish its own schedule.

Mike Bennett, SBC, stated that the majority of the industry wants number pooling to move as fast as possible, but that there are a lot of issues that have not even been identified so we cannot yet go to vendors to ask them to build or change something. Mike stated that there needs to be a check on the remaining work which will not be done by end of 1998. Jo stated that after the 1000s block guidelines are completed for July 1998, the INC will proceed with TN level pooling inside the rate center. Peter Guggina stated that some service providers are telling the state regulators they are going to have to wait until the national level activity is completed to have additional numbering resources should, and that those service providers should apply whatever resources are necessary to get the job done quickly.

D. *Cost Recovery Working Group Report.* Chairman Hasselwander introduced the report and commented that at the December NANC meeting NECA indicated that it would need more money. Following that meeting, the NANC Steering Group met, listened again to NECA's concerns, and concluded that NECA was not willing and able to do the job and that Lockheed Martin IMS should be the NANPA B&C Agent. The Steering Group made this recommendation to the full NANC via email vote. The NANC reached consensus on the recommendation, with two opposing votes and one abstention.

NECA Presentation: Judy Harris, representing NECA, and Ken Levy, NECA Vice President and General Counsel on Regulatory Matters, provided statements to the NANC. Ken Levy stated that NECA was surprised at the NANC letter sent to Commission, and that NECA has acted diligently to put the B&C Agent program together. He asserted that, despite the separate board and additional audits, NECA can still perform the B&C Agent functions for .5 million below Lockheed Martin. He stated that, based on the Requirements Document, NECA did not anticipate the neutrality fix ordered by the Commission. NECA stated in its comments to the Commission that, for a separate corporate board, additional costs would be imposed. Ken asked the NANC to reconsider its earlier recommendation, noting that NECA is still the lowest bidder. NECA's letter to the Commission took issue with the statement that NECA is unwilling or unable to do the job.

Woody Kerkeslager requested comments on the NECA update from the Cost Recovery Co-chairs, Anne LaLena and John Banuelos. Anne stated that NECA has been very cooperative during the 11/5/97 and 12/12/97 meetings and in several calls. She expressed the Working Group's concern that during the process, NECA had not been specific about its questions concerning appropriate compensation or forthcoming with information. There was time to file for clarification but NECA did not, she said. Peter Guggina, MCI, stated that NECA should have been seeking clarification from the Commission immediately after the Order was released. He asserted that too much time has elapsed, and that NANC has to get on with its business and has a responsibility to get this problem taken care of. Peter stated that he would advise NECA to be more attentive to customers needs. Bernie Harris, GTE, stated that NECA has used a less than business like approach to the process. Dan Bart, TIA, stated that he voted against the Steering Group recommendation, noting that the cost of the neutrality cure was not part of the NECA bid.

Judy Harris, outside counsel to NECA, commented that she felt there was a "disconnect" here, and that both sides were operating in good faith. She noted that NECA still had the lower bid, and

that consumers would pay higher costs with Lockheed Martin. She stated that NECA would explore avenues to protect its reputation, and that it is willing to go to the Commission to discuss lowering costs.

Michael Dorrian, Lockheed Martin, voiced concern about cash flow and possible shortfalls if payment to NANPA on March 23, 1998 is not made. He stated that Lockheed Martin has filed a letter with the Commission expressing its concerns. Peter Guggina added that the NANC should send a letter to the Commission stating that NANC's position is unchanged, recommending that the Commission address the issue expeditiously. The Council agreed.

Anne LaLena and John Banuelos completed the Cost Recovery Working Group's report to the NANC. John stated that the Working Group had taken on three items at the December NANC meeting and that the Working Group would be sending a memorandum to Chairman Hasselwander addressing those issues. He stated that the Working Group would be on hold until the Commission addressed the B&C Agent issue, but that the Working Group would continue to work with NECA and informally with Lockheed Martin.

Paul Hart, USTA, asked whether the B&C Agent is going to develop a list of contributors and whether the B&C is going to do it. There was discussion regarding whether one legal operating entity could receive a bill for all of a company's subsidiaries. Chairman Hasselwander stated that the Working Group would try to make this process as efficient as possible.

E. LNPA Working Group Status Report. Before the LNPA Working Group report, Chairman Hasselwander introduced Commission attorney Janice Jamison of the Commission's Wireless Bureau's Policy Division. He stated that the wireless issues are very significant and that the NANC is pleased that she could attend the meeting.

Chairman Hasselwander reported that he attended a joint LLC meeting in Denver at which significant concern was expressed about Phase I implementation commitments. Perot Systems and their vendor, Nortel, provided a presentation. Chairman Hasselwander stated that Perot Systems will not make their Phase I commitments and that the Southeast, Western, and West Coast LLCs were meeting in Dallas to consider their options. Chairman Hasselwander stated that the NANC would be hearing more on that issue and adjustments to the implementation dates.

Bonnie Baca, Co-Chair, Technical and Operational Requirements Task Force, presented the LNPA Working Group report to the Council. The handouts included: (1) an action plan for items following up on the Commission's instructions in the *Second Report and Order*, FCC 97-289, CC Docket No. 95-116; and (2) a NPAC system and center readiness revised schedule.

Bonnie reviewed the follow-up activities report. She stated that the NANC's recommendation on Item 1, the CBT petition, has been forwarded to the Commission and that the issue is considered closed by the Working Group. Regarding Item 10, recommendations on how to incorporate high volume call-in networks into the LNP scheme, Bonnie stated that the LNPA Working Group would vote on a final recommendations before the next NANC meeting. Regarding Item 16, the LNP

Implementation Oversight Committee, Bonnie stated that a meeting had been tentatively scheduled with Lockheed, the NANC Chairman, and Commission representatives for January 21, 1998, to discuss the oversight committee and to gather information.

Regarding the NPAC readiness report, Bonnie reported that three LLCs were meeting on January 20, 1998, to discuss what to do going forward. It was noted that, in Canada, Perot Systems was conducting a number portability trial. Finalization of a master contract with Perot, however, was on hold subject to what happens in the United States. Jacques Sarazin, Stentor, stated that consideration was being given to changing to Lockheed.

Mike Bennett, SBC, stated that carriers are required to file a request for waiver 60 days in advance of any Commission LNP implementation deadline, and that for Phase I, a waiver request by an affected carrier is due by January 30, 1998. There was discussion about the NANC requesting the Commission to extend the deadline for those waivers so that the LLCs that are using Perot will have a better idea of their path forward and can provide more accurate information in their waiver requests. Beth O'Donnell, NCTA, asked how extending the deadline for the waiver petitions would affect the implementation deadline. Chairman Hasselwander stated that the LLCs currently are exploring that issue. Mike Bennett agreed that the LLCs should have an additional 30 days to assess the situation. The NANC agreed that Chairman Hasselwander would send a letter to the Common Carrier Bureau: (1) explaining the situation with Perot; (2) indicating that the NANC thinks that all affected companies should not have to file waiver petitions on Perot issues that are not in their control; (3) stating that the LLCs should provide information that they have for the Commission's consideration; and (4) recommending that if there are waivers, the time not be extended past the end of February. The letter would also state that the NANC does not intend that its request delay implementation of LNP.

Cathy Handley, PCIA, stated that states are depending on LNP for number pooling. Vince Majkowski noted that there will be a domino effect if LNP is not implemented. Bonnie noted the NPACs are operational in 3 out of 4 regions with Lockheed, and that the delay is related only to Perot regions.

Lockheed Martin was asked whether they could perform the NPAC functions in the Perot regions. Larry Vagnoni, Lockheed Martin, stated that Lockheed Martin has responded to LLCs' requests for technical information, and that a plan was to be discussed with the LLCs on January 20, 1998. Larry stated that Lockheed Martin was tentatively looking at the third week of March for testing. He noted that Lockheed Martin's assumption of these functions would require additional resources from Lockheed Martin, that these are business decisions for the LLCs, and that Lockheed Martin would be discussing timelines, resources, and long range goals with the LLCs.

F. Wireline/Wireless Integration Task Force. Lori Messing, Co-chair, introduced the report to the Council regarding the Rate Center Boundary Issue. The WWITF needs a NANC decision on this issue by the February meeting. A work plan with specific assignments will be provided by March 16, 1998.

Presentation by Carl Hansen, Omnipoint Communications - Rate Center Issue. The presentation covered possible solutions including: (1) location portability; (2) rate center consolidation; and (3) CMRS number assignment. The presentation also served as a tutorial for the scope of wireless local calling, NXX usage by wireless carriers, wireless local calling areas, rate centers, and rating and routing.

Carl stated that, in the wireline environment, carriers have NXXs in every rate center. With the current architecture, any wireline customer can port to a wireless carrier offering service in the area. The wireless carrier must either establish a physical point of interconnection (POI) in the rate center, or establish a business arrangement with the wireline carrier for a virtual POI. Calls are rated to the rate center where the original wireline service was provided. Under the current architecture, he said, only wireless customers who desire to port to a wireline service within the same rate center as their assigned NXX can do so. Therefore, according to Carl, although any wireline customers can port to a wireless carrier, only those wireless customers who live in the same rate center as the wireless NXX will be able to port to wireline. Carl stated that this is a disparity, but not a technical problem. He stated that the problem is that the wireline created architecture establishes service provider portability as portability within the rate center, with no consideration of portability outside the rate center. Carl stated that there are no technical rating or routing issues that have been identified in the current architecture which would prohibit portability as described.

Solutions considered: *Location portability* - would allow people to keep their number when they move, similar to wireless mobility. Location portability is part of the current architecture, but only within the rate center. *Rate Center Expansion* -by enlarging the rate centers or joining would allow more wireless customers to port to wireline. *CMRS number assignment* - wireless carriers get NXXs in every rate center and assign all new subscribers numbers in the rate center in which they live; however, only new wireless subscribers would be able to port, and this solution would require several hundred new (4-digit) NPAs.

Carl stated that it is up to NANC to develop a solution for wireline to wireless integration. He said that some parties take the position that wireless/wireline number portability should be delayed until market for it develops (*i.e.*, when customers are actually porting between technologies). In Carl's view, without a solution to the "disparity" wireless/wireline competition will never develop. He stated that one of the advantages of moving forward is that the NANC will meet its Commission mandate. Carl stated that those carriers that want the "disparity" issue resolved recommend that the NANC: (1) reject all arguments which prohibit the full integration of wireline/wireless number portability; (2) reject arguments which propose delaying wireline/wireless number portability based on the rate center issue; (3) direct the Wireline/Wireless Integration Task Force to develop long term solution to the rate center issue; and (4) accept the short term difference in porting capabilities between wireless and wireline while the long term solution is being developed.

Gary Fleming, SBC, reviewed the three issues presented to NANC at the December meeting. The key questions referred to NANC were: (1) whether the difference in scope of porting capabilities creates a competitive disadvantage inconsistent with the Commission's policy objectives for

numbering; (2) whether this competitive disadvantage is overridden by the Commission's order to implement wireless-wireline portability to encourage CMRS wireline competition; and (3) whether disparity would be acceptable from a statutory or regulatory perspective?

Gary noted that competitive parity is required by the Commission. Regarding rate center integrity, Gary stated that rate centers were created by state regulators and provide fundamental building blocks for wireline rating and billing. The requirement for rate center integrity was included in initial NANC report on LNP, was adopted by the Commission, and is a prerequisite to the introduction of number pooling. Gary stated that no available alternatives meet the criteria, and, in any event, there is no meaningful wireless/wireline competition.

Vincent Majkowski, NARUC, stated that wireless carriers are not regulated by the state regulators. He asserted that the industry, not the regulators, is the key ingredient to assuring that the disparity issue is resolved. If the industry wants these problems fixed, they can be fixed. Ed Gould, Teleport, added that not every state required adherence to current boundaries.

Anna Miller, asked if the statement that no wireless/wireline competition exists was based on research. She asked how, if the statement is true, how there could be competitive disparity. Diane Little, Sprint PCS, stated that wireline carriers should not be able to set the rate centers, and then say that the integrity of those rate centers has to be preserved or its discriminatory. She characterized the situation as a limitation rather than as discrimination. Paul Hart stated that the discussion should focus on how the disparity could be solved. He urged the group to move forward, noting that the industry has decided it needs this capability. Chairman Hasselwander stated that the discussion would be continued at the next meeting. Peter Guggina, provided a MCI statement on WWITF position papers. MCI agrees that the disparity is unacceptable, but disagrees with recommendation that addressing the disparity be delayed indefinitely, because of the implications for pooling implementation. MCI recommends that NANC review all CMRS problems on a comprehensive basis. Dan Hochvert, Bell Atlantic, stated the Commission wants competition, but questioned whether we need wireline/wireless portability for competition. He argued that the substitutability between wireline and wireless carriers does not exist. It was agreed that the WWITF materials would be made available on the Commission's NANC web page.

G. SMS/800 Services Presentation. Charron Cox, SMS/800 Management Team (SMT), provided a review of SMS/800 Services. The system and software were defined and developed by the RBOCs and went into service in 1990. This system implementation was ordered by the Commission in CC Docket No. 86-10. Charron stated that the SMT was formed in 1993 to support toll free number portability. It has representatives from each of the RBOCs and is responsible for coordination of SMS/800 services. It operates under a single joint tariff. Classifications of users are RespOrgs and SCPs. Over 200 RespOrgs use the services which include number search and reservation, and customer record provisioning and maintenance. Currently, there are 11 SCPs connected to the system. Charron stated that the vendor selection process was competitively neutral and was administered by outside consultants. All vendors are required to treat customers fairly. Peter Guggina, MCI, stated that the cost to industry in tariff and access charges from the data center

compromises the bulk of the cost attributed to this function. Charron stated that it costs approximately \$7 million a year to support the data center. Charron discussed the SMS/800 Number Administration Committee (SNAC), which identifies, develops, and implements the resolution of issues focused on the support of the 800 SMS.

Diane Little asked about the criteria for SMT or SNAC membership. The SMT is comprised of representatives of the RBOCS. Peter Guggina asked for detailed cost information for each component of the SMS (SMS/800 Help Desk, SMS/800 Data Center, SMS/800 Software Support, and DSMI), and asked when the last Request For Proposal process had occurred. Charron replied that the last RFP for the Data Center was in 1995 with an open bidding process for all who met the criteria. The list was narrowed to three vendors, one of which was SBC. SBC recused itself from the process. Charron stated that the national database does not indicate what traffic is associated with a particular carrier. Cathy Handley asked what would it take to open the SMT membership to others. Charron stated that the SMT has not been approached about opening its membership, and that the Commission is aware that there is a management team with one person from each of the operating companies, and a joint tariff.

H. NANPA Working Group Status Report. Mark Welch, Co-Chair of the NANPA Working Group, provided the report to the Council. He stated that the Guidelines for Aging and Administration of Disconnected Telephone Numbers was revised to address the aging of all telephone numbers and that the aging definition was revised to eliminate the term "ported." Mark stated that the Working Group members agreed it was not appropriate to associate the aging of numbers with the reservation of numbers, and had revised the document accordingly.

There was discussion regarding the options for aging non-working telephone numbers associated with numbers that are being disconnected. Mark stated that the real issue is whether maintaining block integrity or making numbers that were never working immediately available is more important. The question is whether numbers that have never been assigned and are no longer reserved should be aged. He discussed the following options:

Option A. Non-working telephone numbers (TNs) associated with TNs that are being disconnected should be aged for the same interval as the disconnected working telephone numbers when some or all of the working telephone numbers are disconnected. This option allows for maintenance of block integrity, which some think drives NXX requests.

Option B. Non-working TNs associated with working TNs to be disconnected will not be aged. This option allows for some requests for the numbers to be filled immediately. If however, the disconnected numbers snap back, competitively sensitive information may be divulged.

Option C. Non-working TNs associated with working TNs to be disconnected will be aged 30 days although the disconnected TNs could still be in the aging process. This option might eliminate some of the problems with Option B because it lets the customer change its mind.

Peter Guggina, MCI, stated that NANC had agreed that ported unassigned numbers will not be aged and will snap back to the code holder on disconnect. The majority of the NANC voted for Option C as the NANC selection for treatment of numbers that have never been reserved and are no longer assigned .

Guidelines for Reserved Telephone Numbers. Mark stated that a separate document is being created to address guidelines for telephone number reservation. He added that concerns have been raised that associating the term "reserved" with a legally enforceable written agreement implies ownership of a public resource. The NANC agreed to refer this question to the Legal Expertise Working Group to review the legal implications of including the statement "legally enforceable written agreement" in the definition of reserved telephone number.

Toll Free - DSMI. Mark stated that the NANPA Working Group believes that DSMI is in compliance with the neutrality requirements as set forth in the Requirements Document. Participants reached agreement on this issue, with the exception of MCI and AT&T. The broader issues associated with 800/888 administration will be discussed at the next NANC meeting.

I. CO Code Transition Task Force Update. Char Meins, Co-chair of the CO Code Transition Task Force, provided the report to the Council. The Task Force met on January 7-8, 1998 to review the first draft of the NANPA CO Code Administration and NPA Relief Planning Transition Plan. The basic framework of the plan and the order of the transition were accepted. Text modifications resulting from the meeting were posted on the NANPA Working Group web page. Oversight of the transition process will include monthly conference calls. The next conference call will be held on January 21, 1998, and the next face-to-face meetings will be held on February 4-5, 1998. Ron Conners, NANPA, also provided an update to the Council.

NPA Relief Planning. Jim Deak, Regional Director, NPA Relief Planning, NANPA, provided an update. The schedule for site review and visits with the current CO code administrators began in November. Many volunteered to be first in transition process. The transition for area code relief planning will done across the board, while CO Code transition will be done over time. The NANPA needed time to train staff before assuming full responsibility, and had to consider links between CO Code transition and NPA relief planning. The transition plan begins on February 20, 1998 and will conclude on March 31, 1999, a 13 month period. NPA relief planning will transfer to the new NANPA simultaneously across all regions, with the NANPA assuming responsibility for all new NPA relief activities and existing NPA relief activities remaining under the control of the current administrator. NANPA has divided the U.S. into 3 regions Central, Eastern and Western, and assigned senior NPA relief planners and staff to each region.

Roger Werth, CBT, asked whether the NANPA has received notifications from any states that want to do NPA relief planning. Jim indicated that Indiana and Ohio have done so. Responses are due from regulators by mid-March (120 days after selection of new NANPA (11/22/97). JoAnne Sanford, NARUC, stated that there is some confusion by the states on whether or not they could elect to perform part of the functions but not all of the functions of NPA relief planning. Jim stated that

the NANPA will work with the states and that states can take over those functions they want to take over. Chairman Hasselwander noted that the NANPA might be particularly helpful in providing factual information and data in certain areas such as California and Pennsylvania

NANPA CO Code Transition. Bruce Bennett, Regional Director, CO Code Administration, NANPA, provided an update. The CO Code administration transition will be sequential, region by region, starting in April 1998. There will be advance notification to administrators, and educational seminars for code holders and applicants. There will be a conference call held 30 days before each transition with the current Co Code Administrator. NANPA staff will be on site with incumbents during transition. Some of the factors that determined order and timing were volume, size, activity (*i.e.*, how many code applications processing), number of rate centers, and dialing patterns. The NANPA California Regional Office is in Concord, CA.

J. Other Business.

CICs Ad Hoc Group. Peter Guggina provided a quick update on the group's progress, noting that all was proceeding on schedule to report back to NANC and to meet the Commission's February 19, 1998 deadline. He stated that conference calls were scheduled for February 6 and February 18, 1998 and that a face-to-face meeting was scheduled for February 5, 1998 in Washington, DC.

New York Overlay Issue. A Petition for Expedited Waiver of the Commission's ten-digit dialing requirement was filed on January 12, 1998. The petition seeks to retain 7 digit dialing in area code 212 and require ten digit dialing for new code. A Public Notice seeking comments by January 23, 1998 and reply comments by January 28, 1998 has been released. It was agreed that the NANC will explore this issue and advise the FCC of its findings. Marian Gordon stated that the NANC could inform the Chief, Common Carrier Bureau, of its intention to discuss this matter expeditiously and hold a special conference call meeting with appropriate notice under the FACA requirements. It was agreed that a conference call meeting would be held on February 9th from 11 - 1:30 p.m. EST to discuss of NYSPSC petition. The NANC Chairman will send a letter to the Chief, Common Carrier Bureau, advising him of the NANC's intention to meet to discuss the issue and report out to the Commission.

The NANC agreed that Agenda Item 10 (NANC responsibilities under FCC 97-51, N11 Codes and Other Abbreviated Dialing Arrangements) and Agenda Item 11 (Discussion of Paul Hart's memorandum of December 18, 1998), also would be taken up during the conference call; members would be advised of the conference call bridge information

VI. Statement of Action Items and Decisions reached.

1. NANC Chairman will send letters to the Industry Numbering Committee (INC), the Local Number Portability Administration (LNPA) Working Group and the North American Numbering Plan Administration (NANPA) Working Group identifying the issues identified by the Number

Pooling Management Group (NPMG) as being within each group's area of responsibility with regard to the development of national standards for number pooling.

2. NANC Chairman will write to the Chief of the Federal Communications Commission (FCC) Common Carrier Bureau (CCB) indicating that during a presentation by the National Association of Exchange Carriers (NECA), NANC further deliberated the issue of what entity should serve as the Billing and Collection (B&C) Agent for NANPA. The letter will point out that the NANC consensus has not changed (i.e., that Lockheed Martin should assume B&C functions). The letter will urge expeditious Commission resolution of the question because of the importance of putting cost recovery in motion and providing for the payment of the NANPA administrator.

3. NANC Chairman will write to the Chief, CCB, outlining the situation in the Southeast, Western and West Coast Local Number Portability Areas and the likelihood of their missing Phase I implementation deadlines due to delays by the Number Portability Center (NPAC) vendor. The letter will recommend that the three regional Limited Liability Corporations (LLCs) file with the FCC by the required waiver date setting forth as much detail as possible and updating their requirements as more information becomes available. NANC will recommend that affected carriers should not be required to file waivers on the basis of the NPAC problem alone before the end of February 1998. Such an extension should not be construed in itself to delay the implementation of LNP. Carriers of course should file on a timely basis relative to any other issues if such exist.

4. At the February 18 NANC meeting, the discussion of the rate center disparity issue presented by the Wireless/Wireline Integration Task Force (WWITF) will be continued. Relevant materials will be posted on the NANC Web Page.

5. The NANC reached consensus that non-working telephone numbers associated with working telephone numbers to be disconnected will be aged 30 days, although the disconnected telephone numbers are still in the aging process. (Option C in NANPA Working Group Report and Recommendation). The NANPA Working Group will refer to the Legal Expertise Working Group the question whether this decision is consistent with Paragraph 65 of the Third Report and Order in FCC Docket 97-289. The NANPA Working Group will also ask the Legal Expertise Working Group whether it is problematic to use the words "legally enforceable written agreement" in the definition of a reserved telephone number, or whether such an inclusion implies ownership of the public numbering resource. If the Legal Expertise Working Group concludes that it is problematic, it should propose other language that would require the ability to determine whether the numbers had been legitimately reserved.

6. NANC will discuss the issue of the neutrality of Database Service Management, Inc. (DSMI) and the broader issues associated with toll free number administration at its next meeting.

7. The NANC will meet via conference call on February 9, 1998 from 11:00 A.M. Eastern Time until 1:30 P.M. The agenda for that meeting will include discussion of the petition of the New York State Department of Public Service Commission (NYPSC) for Expedited Waiver of 47 CFR

§52.19(3)(c)(ii), which requires mandatory 10-digit dialing when an area code overlay is implemented. Background materials will be sent electronically to NANC members. The agenda will also include two items that the NANC was unable to discuss at its January 20 meeting. These include Item 10, NANC's Responsibilities under 97-51, N11 Codes and Item 11, Paul Hart's memo of December 18, 1997.

8. NANC Chairman will write to CCB Chief indicating its view relative to the significance of the NYPSC's petition referred to in Item 7 above and indicating that NANC will be discussing the issue during the above referenced conference call.